



1300 I Street, NW, Suite 400 West  
Washington, DC 20005

Phone 202 515-2458  
Fax 202 336-7922  
ian.dillner@verizon.com

October 4, 2011

**Ex Parte**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

**Re: Contributions to the Telecommunications Relay Services Fund, CG Docket No. 11-47**

Dear Ms. Dortch:

On October 3, 2011, Chris Miller and I met with Christine Kurth, Policy Director and Wireline Counsel to Commissioner McDowell, to discuss the Commission's implementation of section 715 of the Communications Act of 1934, as amended.<sup>1</sup> In particular, we emphasized that the statute dictates that "*each* interconnected VoIP service provider and *each* provider of non-interconnected VoIP service *shall participate in and contribute to the Telecommunications Relay Services Fund.*"<sup>2</sup> Consistent with the comments Verizon filed in this proceeding,<sup>3</sup> we also discussed the statutory requirement that contributions from VoIP providers be "consistent with and comparable to the obligations of other contributors to such Fund."<sup>4</sup> Finally, we discussed the ongoing need for the Commission to remain focused on ensuring that its contributions methodology is equitable and addresses ongoing marketplace changes, including requiring contributions from VoIP services that, while "free" to end-users, generate revenues as they compete with other services obligated to contribute to the Fund.

Please feel free to contact me if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Ian Dillner".

cc: Christine Kurth

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<sup>1</sup> 47 U.S.C. § 615.

<sup>2</sup> *Id.* (emphasis added).

<sup>3</sup> Comments of Verizon, CG Docket No. 11-47 (filed May 4, 2011).

<sup>4</sup> 47 U.S.C. § 615.